

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VICTOR BROOKS,

Plaintiff,

V.

LISA MADIGAN, *et al.*;

Defendants.

No. 08 CV 2417

Judge Zagel

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendants Mark Ross, Joseph Ponsetto, Edward C. Carter, III, Jorge Montes, and Kenneth Tupy, by their attorney, Lisa Madigan, Attorney General of Illinois, respectfully move this Court for an extension of time of 28 days from July 21, 2008, until August 18, 2008, in which to answer or otherwise plead to Plaintiff's First Amended Complaint. In support of this unopposed motion, the Defendants state as follows:

1. On July 11, 2008, the Plaintiff filed a First Amended Complaint consisting of twelve counts and 33 pages.
2. Counsel for the Defendants require additional time to fairly and completely investigate the allegations of the Complaint and prepare an appropriate response. The Defendants respectfully request the Court extend the time to answer or otherwise plead until August 18, 2008 B 28 days from the date an answer would otherwise be due (July 21, 2008).
3. Counsel for the Defendants conferred with Plaintiff's counsel on July 11, 2008 via telephone. Plaintiff's counsel stated he has no objection to the granting of this motion. Moreover,

the granting of this motion will not prejudice any party and the presentment of this motion is not interposed for delay.

WHEREFORE, the Defendants requests that this motion be granted, and that the Defendants be granted until August 18, 2008, in which to answer or otherwise plead to the First Amended Complaint.

Respectfully submitted,

July 11, 2008

LISA MADIGAN  
Attorney General of Illinois

/s/ Ronald A. Rascia  
RONALD A. RASCIA  
KATHLEEN FORD  
ALLAN ABINOJA  
MARK W. BINA  
Assistant Attorneys General  
100 West Randolph Street  
Chicago, Illinois 60601  
(312) 814-3000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Unopposed Motion for Extension of Time to Answer or Otherwise Plead was served this 11<sup>th</sup> day of July by electronic filing pursuant to Rule XI of the General Order On Electronic Case Filing.

/s/ Ronald Rascia